

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,)
)
)
v.)
) Criminal No. 09-00186-WS
Jacques Monsieur)
)
Defendant.)

MOTION TO TRANSPORT

NOW COMES the defendant Jacques Monsieur and moves the court to enter an order directing the United States Marshal to transport the defendant from Baldwin County Jail to a secure location in the United States Courthouse on the morning of Friday, October 23, 2009 so that he can be available for an attorney/client conference during the day. As grounds for this motion the defendant would show that the defendant has been in custody since arrest in August, 2009.

On Tuesday, October 20, 2009 hundreds of pages of additional discovery was tendered some of which is written in French. In addition a lengthy recorded interview must be reviewed with the defendant. While the undersigned has met regularly with the defendant in the Baldwin County Jail, due to travel time, jail administrative delay and limited visiting hours it is necessary to defense preparation that the defendant is made available in a convenient location for an extended period of time during which information can be reviewed with the aid of a computer.

In addition, the defendant requests that he be allowed during the Monday attorney visit to make an attorney-client call to his attorney in France, Herve Cabeli, Avocat a la Cour, 45 Avenue Montaigne, Paris, telephone number 01 56 89 85 85. The call can be placed from the undersigned's cell phone. The undersigned has been in close consultation with Mr. Cabeli who has represented the defendant from many years.

WHEREFORE defendant prays that the court will enter an order directing the United States Marshal to transport the defendant from Baldwin County Jail to a secure location in the United States Courthouse on the morning of Friday, October 23, 2009 so that he can be available for attorney / client conferences during that day and can make a telephone call to his French attorney, and grant such other and further relief as he may be entitled to receive the premises considered.

/s/ Arthur J. Madden, III
Arthur J. Madden, III
Madda0656
Attorney for Defendant
465 Dauphin Street
Mobile, Alabama 36602
(251) 432-0380
ajmadden@bellsouth.net

CERTIFICATE OF SERVICE

I hereby certify that I have on October 22, 2009 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: AUSA Gregory Bordenkircher, Esq.

/s/ Arthur J. Madden, III
Arthur J. Madden, III

